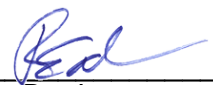


**DENIED**

**BY ORDER OF THE COURT**

DATED: 12/06/2018

BY

  
Hon. Manuel L. Real  
U.S. District Judge

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CHERIE TOWNSEND, an individual; ) Case No. 2-18-cv-10011-R-MAAx  
JALEN LAPREE HAMLER, an ) Hon. Manuel L. Real  
individual, ) Roybal Federal Building  
 ) Courtroom 880, 8<sup>th</sup> Floor  
Plaintiffs, )  
 ) **[PROPOSED] ORDER GRANTING**  
V. ) **PLAINTIFFS' EX PARTE**  
 ) **APPLICATION FOR AN ORDER**  
JIM MCDONNELL, an individual; ) **FOR LEAVE TO CONDUCT**  
CHRISTOPHER BERGNER, an ) **EXPEDITED DISCOVERY AND**  
individual; MARCELO QUINTERO, ) **ORDER FOR PRESERVATION OF**  
an individual; MICHAEL AUSTIN, an ) **DOCUMENTS AND EVIDENCE**  
individual; LOS ANGELES COUNTY, )  
a public entity; LOS ANGELES )  
SHERIFF'S DEPARTMENT, a public ) Action Filed: November 29, 2018  
entity; SUSAN BROOKS, an ) Trial Date: Not yet set.  
individual; THE CITY OF RANCHO )  
PALOS VERDES, a public entity; )  
BRITT HUFF, an individual; THE )  
CITY OF ROLLING HILLS )  
ESTATES, a public entity; and DOES )  
1-20, inclusive, )  
 )  
Defendants. )

1 The *Ex Parte* Application for an Order for leave to Conduct Expedited  
 2 Discovery and Order for Preservation of Documents and Evidence (“*Ex Parte*  
 3 Application”) filed by Plaintiffs’ Cherie Townsend and Jalen Lapree Hamler  
 4 (“Plaintiffs”) came on for hearing on an *ex parte* basis. Having duly considered  
 5 the papers filed with regard to the *Ex Parte* Application and good cause appearing,  
 6 this Court orders as follows:

7 IT IS HEREBY ORDERED that Defendants Jim McDonnell, Christopher  
 8 Bergner, Michael Austin, Marcelo Quintero, (collectively “Defendants”) are,  
 9 within ten days, to:

10 1. Produce Defendants for deposition, including the Persons Most  
 11 Knowledgeable for the County of Los Angeles and Los Angeles Sheriff’s  
 12 Department on dates to be determined with counsel; and

13 2. Plaintiffs have leave to take the depositions discussed above.

14 IT IS FURTHER ORDERED THAT:

15 3. Beginning on December 3, 2018, at 12:01 p.m., Sheriff Alex  
 16 Villanueva and the Los Angeles Sheriff’s Department will preserve all documents  
 17 and evidence related in any way to this case, including witness interviews,  
 18 forensic evidence, and audio and video tape recordings currently in its possession,  
 19 and will produce all such documents and evidence within two days of Plaintiffs’  
 20 written request and on or no later than ten days from the date of this Order.

21 **IT IS SO ORDERED.**

22  
 23 Dated: December \_\_\_\_, 2018

**DENIED**  
 The Honorable Manuel L. Real  
 United States District Court Judge